

EXHIBIT L

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VIA EMAIL

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Re: *Ubiquiti Inc. v. Cambium Networks, Inc. et al.*, Case No. 18-cv-05369 (N.D. Ill.)

Dear Jon:

Thank you for your April 13, 2020 Letter (“Letter”) responding to my April 8, 2020 letter. I will first address the COVID-19 General Orders you raised in your Letter and then address the motion you state Defendants intend to file, which we believe is premature.

I. Effect of COVID-19 General Orders and RFPs

You contend that Defendants cannot access the facilities necessary to investigate the issues raised in my letter. Ltr. p 1. I do not believe we requested that you do so. I separated my April 8 letter into two sections; the former responded to your demands, and the latter addressed issues that the attorneys can work through remotely (e.g., via meet-and-confers). Some examples are (1) Defendants’ refusal to explain what documents are being withheld based upon their objections to the RFPs relating to the 18 Ubiquiti files, (2) whether document searches were performed at the non-Cambium parties prior to the COVID-19 General Orders, and (3) an updated DAT file that includes missing parent/child relationship information (which you stated could be pulled from data Defendants already collected).

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We do not read the COVID-19 General Orders to require that all discussions between the attorneys halt. We instead prefer to work together to make as much progress as the circumstances allow—with everyone’s health in mind. Our goal is to resolve as many disputes (e.g., objections) as possible before shelter-in-place orders are lifted so that the path is clear for both parties to obtain the discovery needed for a productive settlement conference. With that in mind, please identify which of the items in Section II of my April 8 letter you believe are impacted by the COVID-19 circumstances. We will then plan a meet-and-confer to see if there is a way to resolve them remotely.

II. Defendants’ Motion for Clarification or Stay

The motion Defendants threaten is premature. *See* Feinerman Standing Order on Discovery and Motions (citing LR 37.2). The parties have not yet met and conferred on Defendants’ new position that the COVID-19 General Orders act as a blanket “stay” on all discussions related to discovery. Further, as stated in my April 8 letter, we are willing to discuss that “the manner in which discovery in this case may be able to proceed on a mutual basis if Defendants will withdraw their uncompromising and one-sided position that written discovery remain halted while source code production proceeds.”

Please state the relief Defendants intend to seek in their motion so that we can consider it. For example, please (1) identify what precisely Defendants will seek to stay (and what they will seek to have move forward) and (2) provide the language of the clarification Defendants will ask the Court to provide so we can consider them.

We are available to meet and confer at your convenience this week.

Very truly yours,
/s/ Steven J. Reynolds
Steven J. Reynolds

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